## THE LAW OFFICES OF STEVEN E. LYNCH

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January 21, 2022

**BY ECF** 

Hon. Alison J. Nathan United States District Judge Southern District of New York 40 Foley Square New York, NY 10007 USDC SDNY
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Re: United States v. Joshua Oymaian, 21 Cr. 604 (AJN)

Dear Judge Nathan:

Your Honor is currently scheduled to sentence Mr. Oymaian on February 3, 2022. I write to respectfully ask the Court to adjourn Mr. Oyamaian's sentencing. The government consents to this request. There have been no previous requests for an adjournment.

Mr. Oymaian has family and friends who would like to travel from his native California for the sentencing, but are concerned about flying with the current rates of COVID-19 infections. Moreover, Mr. Oymaian is incarcerated in MDC Brooklyn, which has suspended legal visits and imposed lockdowns on inmates for several weeks due to an outbreak of COVID-19 at the facility. As a result, I have not had adequate communication with Mr. Oymaian to prepare and review with him our sentencing submissions.

SO ORDERED For these reasons, we respectfully request an adjournment until the second week of March and a corresponding adjustment of the due date for sentencing submissions. As noted, the government consents to the adjournment. Thank you for your consideration.

1/24/2022

Respectfully Submitted,

Steven E. Lynch

Attorney for Joshua Oymaian

Cc: AUSA Samuel Rothschild (by ECF)
USPO Stephanie M. McMahon (by ECF)